

## **REMARKS**

Applicant respectfully requests reconsideration of this application.

### **Status of Claims**

Claims 4-8 and 21-27 are pending in the application. Claims 1-3 and 20 have been canceled. Claims 9-19 have been withdrawn. Claims 4 and 21 have been amended. The amended claims are supported by the specification. Claims 24-27 have been added. No new matter has been added.

### **Claim Objections**

Claims 4-8 and 21-23 have been objected to as being dependent upon a rejected base claim, claims 1 and 20 respectively.

It is submitted that the objections for claims 4 and 21 should be removed given that claims 4 and 21 have been rewritten in independent form including all of the limitations of base claims 1 and 20 respectively.

It is submitted that the objections for claims 5-8, 22 and 23 should be removed given that claims 5-8, 22 and 23 depend from and include the limitations of a corresponding one of independent claims 4 and 21.

### **Claim Rejections**

Claims 1-3 and 20 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Publication No. 2002/0002526 A1 of Kotas ("Kotas"). Claims 1-3 and 20 have been canceled.

It is submitted that new claims 24 and 27 are patentable over Kotas.

Claims 24 and 27 each disclose the following limitations:

wherein said plurality of contact events includes a bid-in event, a sent request for quote event, and a fact sheet event;

...  
quantifying/quantify participation of each identified bidder in each of said plurality of contact events for said prior bidding event, thereby generating a corresponding participation score for each said identified bidder;

prioritizing/prioritize the identified bidders in a first descending order based on said corresponding participation score, thereby generating a first prioritized list of bidders;

(claims 24 and 27).

The Office Action states that Kotas discloses a method comprising identifying a prior bidding event includes a plurality of contract events for each bidder participating in said prior bidding event. (Office Action page 2). The Office Action points to paragraphs 0022 and 0023 and table 1 in support of this assertion. Applicant respectfully disagrees with the Office Action's characterization of Kotas.

In paragraph 0023, Kotas discloses:

Table 1 shows a list of users that have bid in auction 1, a list of the users that have bid in auction 2, a list of the users that have bid in auction 3, and a list of the users to whom auction 3 has already been promoted. In order to identify users to whom to promote auction 3, the facility examines the lists of users that have bid in auctions 1 and 2. In the example, the facility applies the threshold that, in order for another auction to be considered, at least seventy percent of the users that bid in the selected auction must have bid in the other auction. In terms of the number of users that have bid in auction 3 in the example, this means that at least three of the users that have bid in auction 3 must have bid in each of the other two auctions for them to be considered ( $4 \times 70\% = 2.8$ ).

(Kotas paragraph 0023).

As can be seen by an inspection of the above quoted passage, Kotas discloses only a single contact event for each prior bidding event (auction 1 and auction 2), namely whether a user did or did not bid in the prior bidding event. (See paragraph 0023 and

Table 1). Kotas does not disclose any other contact events. Kotas does not disclose a sent request for quote event nor a fact sheet event. Kotas then discloses comparing the users that bid in the prior bidding event to the current bidding event and applying a threshold to generate a non-prioritized list of users. (See paragraph 0024 and Table 2).

Kotas does not disclose the following limitations of claims 24 and 27:

wherein said plurality of contact events includes a bid-in event, a sent request for quote event, and a fact sheet event;

...

quantifying/quantify participation of each identified bidder in each of said plurality of contact events for said prior bidding event, thereby generating a corresponding participation score for each said identified bidder;

prioritizing/prioritize the identified bidders in a first descending order based on said corresponding participation score, thereby generating a first prioritized list of bidders;

(claims 24 and 27).

Therefore, Kotas does not disclose each and every limitation of claims 24 and 27. It is submitted that claims 24 and 27 are patentable over Kotas.

It is also submitted that new claims 25 and 26 are patentable over Kotas given that claims 25 and 26 depend from and include the limitations of independent claim 24.

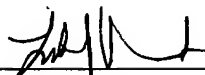
In view of the foregoing remarks, applicant respectfully submits that all of the rejections and objections have been overcome. Applicant reserves all rights with respect to the applicability of the doctrine of equivalents.

If there are any charges, please charge Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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